

# **EXHIBIT 1**

**DECLARATION OF TANYA ROMERO-BACA**

I, Tanya Romero-Baca, declare as follows:

1. I am a United States citizen. I was born in Miami, Florida and I currently live in Houston, Texas.
2. I am married to David Castillo. We have been married for 10 years. Together we have three young daughters, who also are United States citizens and live in Houston.
3. David was born in Honduras. After high school, the West Point Military Academy offered him a full tuition scholarship. He graduated from West Point after studying electrical engineering.
4. After David graduated from West Point, he worked for a private technology company in Maryland. After working for that company for a few years, David returned to Honduras to fulfill his commitment to the military.
5. After David fulfilled his military obligations, he joined the Board of Directors for Desarrollos Energéticos S.A. (“DESA”), an infrastructure company that focuses on renewable energy projects. Eventually, he became DESA’s President.
6. David also started companies on his own, including Potencia y Energía de Mesoamerica (“PEMSA”), a company that develops renewable energy projects, including a solar power facility located in Nacaome, Honduras.
7. DESA’s only project, Agua Zarca, was to build a hydro-electric run-of-river on the Rio Blanco in Honduras.
8. COPINH and Ms. Cáceres opposed the Agua Zarca project and targeted David because he worked for DESA. As an extension, our family also became targets.
9. COPINH’s opposition to Agua Zarca began in earnest in 2013. We were forced to hire personal security to protect our family, but I still worried for our family’s safety.

10. After Ms. Cáceres was murdered, the threats to our safety became more serious because COPINH and the Cáceres family immediately blamed DESA for her murder.

11. Our family was forced to leave Honduras because of serious safety concerns that were exacerbated by Ms. Cáceres' death. We decided to move to Houston because I have family who live there.

12. In November 2016, we purchased a home located at 3735 Jardin Street, Houston, Texas. We moved into the home in June 2017 and I am still living there with our three children.

13. The house is titled to both David and me. It is also mortgaged in both of our names.

14. When we applied for the mortgage, we were required to disclose private information, including information about our income and assets. None of this information has been shared with anyone outside of the mortgage application process (with the exception of our accountants and lawyers).

15. As a down payment for the Houston home, we used money we saved, mostly from PEMSA and other companies David owned.

16. Before he was arrested, David continued to work and live in Honduras, but would travel to Houston to visit us on the weekends.

17. David is a loving husband and a good father. He worked hard to be a good provider and take care of our family. He was a successful and respected businessman in Honduras before his arrest. He also worked hard to make Honduras a better place, spending time on renewable energy projects, including the Agua Zarca project.

18. Throughout our relationship, I have never observed David being violent.

19. David had never been charged with any crimes until his arrest related to the Berta Cáceres' murder.

20. I learned about the *Ex Parte* Application shortly after it was filed only because my attorney in Tegucigalpa, Honduras received an email from an international reporter requesting my comments on the issue. The lawyers who filed the *Ex Parte* Application never notified me. Without that email, I would not have learned about this Application.

I declare under the penalty of perjury that the foregoing is true and correct.

EXECUTED on 22 of August, 2019.



Tanya Romero-Baca